

**REMARKS**

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

By the foregoing amendment, claims 3, 4, 7, 9-11 and 15 have been amended. Support for the amendments may be found, for example, at line 18 of page 21 to line 22 of page 22. Claims 1 and 13 have been previously canceled without prejudice or disclaimer for filing in a continuation application. Claims 3-6, 12, 14, 16/3-16/6, 16/12 and 16/14 have been withdrawn. Thus, claims 2, 7-11, 15 and 16 are currently pending in the application and subject to examination.

**Informal Matters**

In the Office Action mailed October 12, 2007, claims 3-6 were objected to for informalities and claims 2, 7, 8 and 16/2 were rejected under 35 USC § 112, second paragraph. Claims 3 and 4 have been amended responsive to the objection and claim 7 has been amended responsive to the rejection. If any further amendment is necessary to overcome the objection and rejection the Examiner is requested to contact the Applicant's undersigned representative.

**Rejections under 35 U.S.C. §§ 102 and 103**

In the outstanding Office Action, claims 9 and 15 were rejected under 35 U.S.C. § 102(e) as being anticipated by Koren et al. (US Patent No. 6,831,686, hereinafter, "Koren"). Claims 7, 8, 10, 16/9, 16/10 and 16/15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Koren in view of Park (US 2003/0202111). Claims 2, 11, 16/2 and 16/11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Koren and Park, and further in view of Chiu (US 2003/0016294).

The amended claim 9 recites "wherein said correction circuit comprises an offset generation section which compares the pixel signals for each column with a reference value corresponding to brightness of at least one frame of an image, generates said offset for each column dynamically according to the result of the comparison, and updates the dynamically generated offset for each column as the offset for each column."

According to the Applicants' invention as recited in claim 9, the offset generation section dynamically generates the offset for each column by comparing the pixel signals for each column with a reference value corresponding to brightness of at least one frame of an image, and updates the dynamically generated offset for each column as the offset for each column.

Koren discloses at col. 3, lines 2-3, "where the parameters  $\alpha(i)$ ,  $1/\beta(i,j)$ , and  $\text{dark}(i,j,T_{\text{int}})$  are determined beforehand and fed to the correction unit FPNC". Therefore, the Applicants submit that the parameter  $\alpha(i)$ , which may correspond to the offset for each column of claim 9, is determined beforehand and never updated. Further, according to Koren at col. 3, lines 61-66, "In order to determine the offset  $\text{Offs}(i)$  or  $\alpha(i)$ , a non-exposed line, for example the line  $i=2$ , is read out completely, with the integration time  $T_{\text{sub.int}}$  set to be minimal, and is converted by the analog-to-digital converters and subsequently corrected by the linearization unit LUT and written to the random access memory RAM as value  $\alpha(i)$ ." Therefore, pixel signals of the non-exposed line of  $j=2$  in FIG. 3 are stored in RAM as the offset value  $\alpha(i)$ . Thus Koren does not teach "an offset generation section which compares the pixel signals for each column with a reference value corresponding to brightness of at least one frame of an

image, and generates said offset for each column dynamically according to the result of the comparison," as recited in amended claim 9.

According to the Applicants' invention as recited in claim 7, as amended, "said color sensitivity correction circuit comprises an offset generation section which compares pixel signals for each column with a reference value corresponding to brightness of at least one frame of an image, dynamically generates the second offset according to the result of the comparison, and updates the dynamically generated second offset as the second offset." Therefore, similarly to as explained above with respect to claim 9, Koren does not teach this limitation the invention as recited in amended claim 1.

Park and Chiu are not cited for and do not cure the deficiencies of the above combination.

Accordingly, the Applicants submit that none of the applied art of record, alone or combined, discloses or suggests each and every feature recited in independent claims 7 and 9.

For at least this reason, the Applicant submits that independent claims 7 and 9 are allowable over the applied art of record. As claims 7 and 9 are allowable, the Applicant submits that claims 2, 8, 10, 11, 15 and 16, each of which depends from at least one of allowable claims 7 and 9, are likewise allowable for at least the reasons set forth above with respect to claims 7 and 9.

### Conclusion

For all of the above reasons, it is respectfully submitted that the claims now pending patentability distinguish the present invention from the cited references.

Accordingly, reconsideration and withdrawal of the outstanding rejections and an issuance of a Notice of Allowance are earnestly solicited.

Should the Examiner determine that any further action is necessary to place this application into better form, the Examiner is invited to contact the undersigned representative at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicants hereby petition for an appropriate extension of time. The Commissioner is hereby authorized to charge any fee deficiency or credit any overpayment associated with this communication to Deposit Account No. 01-2300 referencing client matter number 108066-00091.

Respectfully submitted,



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